

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

OKLAHOMA FIREFIGHTERS PENSION  
AND RETIREMENT SYSTEM, Individually  
and on Behalf of All Others Similarly  
Situated,

Plaintiff,

v.

DEUTSCHE BANK  
AKTIENGESELLSCHAFT (F/K/A  
DEUTSCHE BANK AG); DEUTSCHE  
BANK SECURITIES INC.; CITIGROUP  
GLOBAL MARKETS LIMITED;  
CITIGROUP GLOBAL MARKETS INC.;  
RBC EUROPE LIMITED; RBC CAPITAL  
MARKETS LLC; HSBC BANK PLC; HSBC  
SECURITIES (USA) INC.; MORGAN  
STANLEY & CO. INTERNATIONAL PLC;  
and MORGAN STANLEY & CO. LLC,

Defendants.

Case No. 1:23-cv-05095

The Honorable John G. Koeltl

**PLAINTIFF'S NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF  
STIPULATION AND AGREEMENT OF SETTLEMENT WITH CITIGROUP GLOBAL  
MARKETS LIMITED, CITIGROUP GLOBAL MARKETS INC., HSBC BANK PLC,  
HSBC SECURITIES (USA) INC., RBC EUROPE LIMITED, RBC CAPITAL MARKETS,  
LLC, MORGAN STANLEY & CO. INTERNATIONAL PLC, AND  
MORGAN STANLEY & CO. LLC**

**PLEASE TAKE NOTICE** that Plaintiff Oklahoma Firefighters Pension and Retirement System (“Plaintiff”) will, and hereby does, move the Court pursuant to Fed. R. Civ. P. 23(e) for an order preliminarily approving the proposed settlement with Citigroup Global Markets Limited, Citigroup Global Markets Inc., HSBC Bank plc, HSBC Securities (USA) Inc., RBC Europe Limited and RBC Capital Markets, LLC, Morgan Stanley & Co. International plc, and Morgan Stanley & Co. LLC (together, “Settling Defendants”).

Submitted herewith in support of this Motion are the:

- (1) Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Approval of Stipulation and Agreement of Settlement with Settling Defendants; and
- (2) Declaration of Patrick Coughlin in Support of Motion for Preliminary Approval of Stipulation and Agreement of Settlement with Settling Defendants and accompanying exhibit.

Dated: October 31, 2024

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**

s/ Patrick Coughlin  
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Pension and Retirement System, and Proposed  
Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 31, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

*s/ Patrick Coughlin*  
PATRICK COUGHLIN